

**EXHIBIT 3**  
**Proposed Order**

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24 *successor in interest to Industrial*  
25 *Underwriters Insurance Company for*  
26 *policies JU835-8355 and JU895-0964*

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UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re:

The Roman Catholic Archbishop of San  
Francisco,

Debtor and  
Debtor in Possession.

Case No. 23-30564 (DM)

Chapter 11

**[PROPOSED] ORDER APPROVING *EX*  
*PARTE* APPLICATION OF CERTAIN  
INSURERS FOR ENTRY OF AN ORDER  
PURSUANT TO BANKRUPTCY RULE  
2004 COMPELLING PRODUCTION OF  
DOCUMENTS**

Upon consideration of the Ex Parte *Application of Certain Insurers for Entry of an Order Pursuant to Bankruptcy Rule 2004 Compelling Production of Documents* [Docket No. [\_\_]] (the “**Application**”),<sup>1</sup> the record in this case, and for good and sufficient cause appearing,

IT IS HEREBY ORDERED AS FOLLOWS:

1. The Application is GRANTED.
2. The Insurers are authorized to issue a subpoena directed to the Debtor (the “**Debtor Subpoena**”) requiring the Debtor to produce documents responsive to the Debtor Document Requests.
3. Except as otherwise agreed by the Insurers, the Debtor shall furnish all documents the Insurers request in the Debtor Subpoena and shall produce the same to the Insurers’ counsel within fourteen (14) days of service of the Debtor Subpoena upon entry of this Order.
4. The Insurers are authorized to issue a subpoena directed to the Committee (the “**Committee Subpoena**”) requiring the Committee to produce documents responsive to the Committee Document Requests.
5. Except as otherwise agreed by the Insurers, the Committee shall furnish all documents the Insurers request in the Committee Subpoena and shall produce the same to the Insurers’ counsel within fourteen (14) days of service of the Committee Subpoena upon entry of this Order.

<sup>1</sup> All terms not otherwise defined in this Order shall have the meanings ascribed to them in the Application.

1           6.       Nothing herein shall prejudice the Insurers' rights under Rule 2004 and other  
2 applicable laws to seek further document production and/or oral examinations in connection with  
3 the above-captioned case.

4           7.       The Court shall retain jurisdiction to hear and determine all matters arising from or  
5 related to the implementation of this Order.

6                               **\*\*END OF ORDER\*\***